

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES OF AMERICA,)	
)	
v.)	Case No. 1:09-CR-091 (GBL)
)	
SORIPADA LUBIS,)	Sentencing Date: August 13, 2009
)	
Defendant)	
)	

**SUPPLEMENT TO REPLY OF DEFENDANT TO GOVERNMENT’S SENTENCING
MEMORANDUM**

COMES NOW the Defendant, SORIPADA LUBIS, by his attorney, Kevin Brehm, and hereby supplements his previous response to the Sentencing Memorandum filed by the government by attaching numerous photographs of the purported “victims” in this case, along with some of the initial statements made by women living at the Lubis residence, as well as a letter from Dr. Bui who has been treating Mr. Lubis for many years.

The purpose of the photographs is to show that the women were happy staying at the residence, were not held prisoner or otherwise detained in the residence, and would travel together outside the residence throughout the metro Washington area and beyond. The initial statements reflect the same facts, and also directly contradict later allegations of sexual abuse or other misconduct by Mr. Lubis. The letter of Dr. Bui confirms that Mr. Lubis has goiter and diabetes, and also states that he had been treated for erectile dysfunction (impotence) for many years, which is relevant to some allegations of sexual misconduct.

The Defendant again asks this Honorable Court to impose a total sentence of four (4) years probation, or in the alternative, three (3) years of supervised release with five (5) months of home confinement (as a substitute for imprisonment), for all of the reasons previously set forth in the different pleadings and letters filed on behalf of the Defendant.

Such a sentence is sufficient in this case to accomplish the purposes of sentencing as set forth in 18 U.S.C. §3553(a).

Respectfully submitted,

SORIPADA LUBIS

By Counsel,

Michael S. Nachmanoff,
Federal Public Defender

By: /s/
Kevin Brehm
Assistant Federal Public Defender
pro hac vice (for now)
Attorney for Soripada Lubis
Office of the Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
703-600-0825
703-600-0880 (fax)
kevin_brehm@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of August, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Michael Frank, Esquire
James P. Gillis, Esquire
Assistant U.S. Attorney
2100 Jamieson Ave.
Alexandria, Virginia, 22314
(703) 299-3700
(703) 299-2584 (facsimile)
james.p.gillis@usdoj.gov
michael.frank2@usdoj.gov

_____/s/
Kevin Brehm
Assistant Federal Public Defender
pro hac vice (for now)
Attorney for Soripada Lubis
Office of the Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
703-600-0825
703-600-0880 (fax)
kevin_brehm@fd.org

